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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL SPECIALTY PHARMACY, LLC	)	
	)	Case Number: 23-cv-04357-NW
	)	
<i>Plaintiff,</i>	)	<b>STIPULATION PURSUANT TO</b>
	)	<b>F.R.C.P. RULE 41(a)(1)(A)(ii) TO</b>
vs.	)	<b>DISMISS DEFENDANT</b>
	)	<b>BENJAMIN D. BROWN</b>
SAMEER PADHYE, an individual,	)	
BENJAMIN D. BROWN, an	)	<b>Hon. Noël Wise</b>
individual, and DOES 1 to 49,	)	
inclusive,	)	
<i>Defendants.</i>	)	

Pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii), Plaintiff National Specialty Pharmacy, LLC; Defendant Sameer Padhye; and Defendant Benjamin D. Brown respectfully submit this Stipulation and Proposed Order to dismiss Defendant Benjamin D. Brown from this Action without prejudice.

WHEREAS, Plaintiff National Specialty Pharmacy, LLC and Defendant Benjamin D. Brown have agreed to a settlement of their dispute, including Mr. Brown's dismissal from this Action without prejudice;

WHEREAS, Defendant Sameer Padhye consents and stipulates to the dismissal of Mr. Brown from this Action;

NOW THEREFORE, in consideration of the foregoing, the parties hereby STIPULATE and AGREE as follows:

1 That Defendant Benjamin D. Brown be dismissed from this Action without prejudice,  
2 with Defendant Brown and Plaintiff National Specialty Pharmacy LLC to bear their own costs  
3 and fees.

4 IT IS SO AGREED AND STIPULATED.

5  
6 Dated: February 25, 2025

**DHILLON LAW GROUP INC.**

7 /s/ Nitoj P. Singh

8 Nitoj P. Singh (SBN 265005)  
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National Specialty Pharmacy, LLC

14 Dated: February 25, 2025

**THE LAW OFFICE OF RICHARD H.  
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22 Dated: February 25, 2025

**BENJAMIN D. BROWN**

23 /s/ Benjamin Daniel Brown

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